

Dear Madam Mayor and Council,

The Twinbrook Citizens Association, having reviewed the *"Ordinance to comprehensively revise and amend Chapter 5 of the Rockville City Code entitled "Buildings and Building Regulations," by amending certain provisions pertaining to Building Restriction Lines ( Building restriction lines are now included as part of the Zoning Code), Numbering of Buildings, and Dangerous Buildings; by adopting with certain additions, deletions and amendments the ICC International Building Code, (2009 Edition), the International Residential Code, (2009 Edition), the National Electrical Code, (2008 Edition), the ICC International Energy Conservation Code, (2009 Edition), the ICC International Fuel Gas Code, (2009 Edition), the National Fire Protection Association Codes, NFPA 51 (2007), NFPA 54 (2009), and NFPA 58, (2008), the ICC International Mechanical Code, (2009 Edition), and the ICC International Plumbing Code, (2009 Edition); and by adding a new Article XIII, entitled "Existing Building Code", adopting the ICC International Existing Building Code, (2009 Edition); and by adding a new Article XIV, entitled "Green Building Regulations"; and by otherwise generally revising and amending Chapter 5, Articles I through XI."* wishes to submit the following comments to the public record.

1. The 110% buildout rule should be changed to a threshold of 1000SF irregardless of the size of the house.

Per the Staff report: "The proposed threshold of an increase in size of 110% or 1500 SF is allowed before triggering retrofit of an existing residence."

Many houses in Twinbrook average 900SF or less. Applying the 110% rule would establish a threshold for such houses of approximately 990SF.

Compared to the City's average house footprint of approximately 2000SF, this means that a (hypothetical) house in perhaps West End or College Gardens of 1380SF or greater would be able to build out 990SF WITHOUT triggering the threshold for retrofit. This hypothetical house in West End or College Gardens would even be able to build out *another* 509SF without triggering the threshold for retrofit.

The 110% rule would therefore be applied regressively to every house under 1380SF in Rockville (110% of 1380SF = 1500SF, approximately).

We ask a) why 990SF attached to a small house should be considered any differently than 990SF attached to a large house, and b) why houses smaller than 1380SF are being asked to comply with the new building code before larger house.

2. That where installing Energy Star appliances would require installing an appliance LARGER than the space occupied by the existing appliance OR would require structural alterations to a house, that the requirement for Energy Star appliances be waived.

Per the Staff report: "All appliances that are available as Energy Star to be installed."

With regard to houses that are very small, fitting (or squeezing) in appliances can be difficult. Houses (especially in Twinbrook) often have furnaces fitted into closets barely bigger than the furnace, or kitchens where appliances butt up against each other without intervening counter space. This is especially applicable in older houses which were built without space for washers and dryers, which are often fitted into the kitchen or in small additions.

We do not want to see situations where the necessity to replace a dishwasher necessitates tearing apart the kitchen, or situations where replacing a furnace results in realigning interior walls.

While Staff assures us that newer, energy efficient appliances are often smaller than current models, we respectfully ask that this escape clause be added in order to prevent situations where the need to replace a dishwasher necessitates tearing apart the kitchen, or situations where replacing a furnace results in realigning interior walls.

### 3. Green Roofs

In commercial areas, where green roofs are possible, genuine green roofs using xeric plants should be used whenever possible.

Sincerely,

Christina Y. Ginsberg  
Twinbrook Citizens Association